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*Lead Counsel for Lead Plaintiff Denis Bourque*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARC BERNSTEIN, Individually and On Behalf of All Others Similarly Situated, Plaintiff.

Case No. 2:22-cv-00315-CDS-DJA

The Hon. Cristina D. Silva

## **LEAD PLAINTIFF DENIS BOURQUE'S NOTICE OF VOLUNTARY DISMISSAL**

MP MATERIALS CORP. f/k/a FORTRESS  
VALUE ACQUISITION CORP., JAMES H.  
LITINSKY, RYAN CORBETT, ANDREW A.  
MCKNIGHT, and DANIEL N. BASS,

## Defendants.

1 NOTICE IS HEREBY GIVEN that, pursuant to Federal Rule of Civil Procedure  
2 41(a)(1)(A)(i), Lead Plaintiff Denis Bourque (“Plaintiff”) hereby voluntarily dismisses this action,  
3 without prejudice, as to all Defendants (MP Materials Corp. *f/k/a* Fortress Value Acquisition Corp.,  
4 James H. Litinsky, Ryan Corbett, Andrew A. McKnight, and Daniel N. Bass), and without prejudice  
5 to his ability to participate in related actions as an absent class member. As grounds therefore,  
6 Plaintiff states that: (1) no opposing party has served either an answer or a motion for summary  
7 judgment; and (2) this dismissal will not bind or prejudice any party or member of the putative class.

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Dated: August 24, 2022

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**ALDRICH LAW FIRM, LTD.**

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*/s/ John P. Aldrich* \_\_\_\_\_

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*Liaison Counsel for Lead Plaintiff Denis Bourque*

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*Additional Counsel*

## **PROOF OF SERVICE BY ELECTRONIC POSTING**

I, the undersigned say:

3 I am not a party to the above case, and am over eighteen years old. On August 22, 2022 I  
4 served true and correct copies of the foregoing document by posting the document electronically to  
5 the ECF website of the United States District Court for the District of Nevada, for receipt  
6 electronically by the parties listed on the Court's Service List.

7 I affirm under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct. Executed on August 24, 2022 at Las Vegas, Nevada.

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